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March 10, 2020

*Via ECF & Hand-Delivery*

Hon. William H. Pauley, III, U.S.D.J.  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, NY 100070

**MEMO ENDORSED**

Re: **725 Eatery Corp., etc. et ano. v. City of New York, et al.,  
Docket No. 02 CV 4431 (WHP) ("Action No. 1")**

**59 Murray Enterprises, Inc. etc., et ano. v. City of New York, et al.,  
Docket No. 02 CV 4432 (WHP) ("Action No. 2")**

**Club at 60<sup>th</sup> Street, et al. v. City of New York  
Docket No. 02 CV 8333 (WHP) ("Action No. 3")**

**336 LLC, etc, et al. v. City of New York  
Docket No. 18 CV 3732 (WHP) ("Action No. 4")**

Dear Judge Pauley:

We represent plaintiffs in the above-referenced Action No. 2 and write on behalf of all counsel to advise the Court of the status of this matter and request re-scheduling of the dates for the Joint Status Report and Preliminary Conference.

The Joint Status Report is currently due on March 20, 2020, and the Preliminary Conference is presently scheduled to be held on March 27, 2020, at 10:30am.

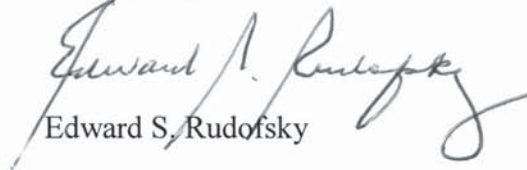
Counsel are continuing to work together in a cooperative fashion. At this time, the draft Proposed Stipulation of Facts, which is in its fourth (4<sup>th</sup>) iteration, addresses 99 proposed facts, however, it is still a work in process as counsel are continuing to exchange information and draft language. We are also awaiting the imminent promulgation of a new Buildings Department Bulletin on which the City intends to rely, but which is not yet available for our review.

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Under the circumstances, counsel are of the view that the most efficient way to proceed would be for the Court to re-schedule the Joint Status Report and Preliminary Conference dates for early and mid-May, respectively, and we accordingly jointly request that the Court do so, consistent with its own schedule.

As always, we thank the Court in advance for its consideration.

Respectfully,

  
Edward S. Rudofsky

Cc: All Counsel (Via ECF)

**Application granted. The status conference is adjourned to May 14, 2020 at 11:00 a.m. The parties shall submit their joint status report by May 4, 2020.**

Dated: March 11, 2020  
New York, New York

SO ORDERED:

  
WILLIAM H. PAULEY III  
U.S.D.J.